

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. CARLOS MAURICE HARRIS, and

2. RONALD HAROLD MOORE,

Defendants.

) INDICTMENT

CR10-323RHK/SRN

)

) (18 U.S.C. § 2)

) (18 U.S.C. § 922(g)(1))

) (18 U.S.C. § 924(c))

) (18 U.S.C. § 924(e))

) (18 U.S.C. § 1951(a))

) (18 U.S.C. § 3559(c)(1))

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)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Interference with Commerce by Robbery - "Hobbs Act")

On or about October 27, 2010 in the State and District of
Minnesota, the defendants,

CARLOS MAURICE HARRIS, and
RONALD HAROLD MOORE,

aiding and abetting each other did, unlawfully obstruct, delay and
affect, and attempt to obstruct, delay and affect, commerce as that
term is defined in Title 18, United States Code, Section 1951, and
the movement of articles and commodities in such commerce, by
robbery as that term is defined in Title 18, United States Code,
Section 1951, in that the defendants did unlawfully take and obtain
personal property consisting of U.S. Currency from the person and
immediate presence of employees of a Dunn Bros coffee business
against their will by means of actual and threatened force,
violence, and fear of injury, immediate and future, to their
persons, that is, defendants used a firearm to compel employees of

SCANNED

DEC 07 2010

U.S. DISTRICT COURT ST. PAUL

FILED DEC 07 2010
RICHARD D. SLETTEN, CLERK
JUDGMENT ENTD. _____
DEPUTY CLERK _____

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Dunn Bros, a business engaged in interstate commerce, to relinquish U.S. Currency belonging to the business to the defendants, all in violation of Title 18, United States Code, Sections 2 and 1951(a).

COUNT 2

(Possession of Firearm in Furtherance of
a Crime of Violence)

On or about October 27, 2010, in the State and District of Minnesota, the defendants,

**CARLOS MAURICE HARRIS, and
RONALD HAROLD MOORE,**

aiding and abetting each other did knowingly and unlawfully possess a firearm, specifically, a Hi-Point C9 9mm Pistol, serial number P1339134, in furtherance of a crime of violence which may be prosecuted in a court of the United States; that is, the armed robbery described in Count 1 of the Indictment, all in violation of Title 18, United States Code, Section 924(c)(1).

COUNT 3

(Felon in Possession of Firearm)

On or about October 27, 2010, in the State and District of Minnesota, the defendant,

CARLOS MAURICE HARRIS,

having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, namely:

CHARGE	YEAR OF CONVICTION (on or about)	JURISDICTION
Aggravated Robbery	1990	Anoka County, Minnesota

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CHARGE	YEAR OF CONVICTION (on or about)	JURISDICTION
Aggravated Robbery	1990	Dakota County, Minnesota
Aggravated Robbery	1994	Washington County, Minnesota
First Degree Assault	1994	Washington County, Minnesota
Third Degree Burglary	2010	Dakota County, Minnesota

did knowingly and intentionally possess in and affecting interstate commerce, a firearm, specifically a Hi-Point C9 9mm Pistol, serial number P1339134, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)(1).

COUNT 4

(Felon in Possession of Firearm)

On or about October 27, 2010, in the State and District of Minnesota, the defendant,

RONALD HAROLD MOORE,

having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, namely:

CHARGE	YEAR OF CONVICTION (on or about)	JURISDICTION
Second Degree Assault	1983	Ramsey County, Minnesota
Third Degree Criminal Sexual Conduct	1986	Ramsey County, Minnesota
Drugs - Prohibited Acts	1989	Ramsey County, Minnesota

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CHARGE	YEAR OF CONVICTION (on or about)	JURISDICTION
Drugs - Prohibited Acts	1989	Ramsey County, Minnesota
First Degree Assault	1994	Washington County, Minnesota

did knowingly and intentionally possess in and affecting interstate commerce, a firearm, specifically a Hi-Point C9 9mm Pistol, serial number P1339134, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)(1).

FORFEITURE ALLEGATIONS

Counts 1 through 4 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense alleged in Count 1 of this Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Sections 2 and 1951(a).

Upon conviction the offenses alleged in Counts 2 through 4 of this Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), any firearm with accessories or any ammunition involved in or used in

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any knowing violation of sections 922(g)(1), 924(c)(1), and 924(e)(1), including a Hi-Point C9 9mm Pistol, serial number P1339134.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Sections 2, 922(g)(1), 924(d)(1), 924(c)(1), 924(e)(1), 981(a)(1)(C), and 1951(a) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON